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17 *Attorneys for Plaintiff*  
18 FINJAN, INC.

19  
20 **IN THE UNITED STATES DISTRICT COURT**  
21  
22 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
23  
24 **SAN JOSE DIVISION**

25 FINJAN, INC.,

26 Plaintiff,

27 v.

28 SONICWALL, INC.,

Defendant.

Case No.: 5:17-cv-04467-BLF-VKD

**DECLARATION OF AARON FRANKEL IN  
SUPPORT OF DEFENDANT'S  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL**

I, Aaron Frankel, declare as follows:

1. I am a partner with the law firm of Kramer Levin Naftalis & Frankel LLP (“Kramer Levin”), counsel of record for Plaintiff Finjan, Inc. (“Finjan”). I have personal knowledge of the facts set forth in this declaration and can testify competently to those facts. I make this declaration in support of Defendant SonicWall Inc.’s (“SonicWall”) Administrative Motion to File Documents Under Seal pursuant to Civil Local Rules 7-11 and 79-5(d) and 79-5(e).

2. I have reviewed the following documents and confirmed that they contain information designated as confidential by Finjan.

Identification of Documents or Portions of Document to be Sealed	Portions of Document to be Sealed	Designating Party
Selections of the Joint Discovery Letter. [Dkt. No. 249-3]	Highlighted portions on pg. 2 and pg. 3.	Finjan
Exhibit A to Joint Discover Letter. [Dkt. No. 249-5]	Entirety	Finjan

3. Finjan supports SonicWall’s request for leave from the Court to file the documents described above under seal because such information contains confidential business, competitive, and privileged information regarding Finjan’s business model and patents. These portions have been designated by Finjan as confidential and this information about Finjan’s business and competitive information is afforded a high degree of protection and security within Finjan’s business to avoid inadvertent public disclosure. The public disclosure of such internally sensitive information, including information about the terms of Finjan’s business structure and agreements could result in significant competitive harm.

I declare under the penalty of perjury under the laws of the United States of America that each of the above statements is true and correct. Executed on April 21, 2020, in New York, NY.

/s/ Aaron Frankel  
Aaron Frankel